



**FILED**  
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02:35 PM

EXHIBIT A

EXHIBIT A

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**In the Matter of the Complaint of:**

**Starline Tours of Hollywood, Inc., a  
California corporation,**

**Complainant**

**vs.**

**EHM Productions, Inc, a California  
corporation, A.K.A and dba TMZ,  
MBLC Productions, Inc., a California  
corporation, dba TMZ Tour and TMZ  
Celebrity Tour,**

**Defendants**

**Case No. C16-06-007**

**FIRST AMENDED COMPLAINT FOR UNLAWFUL OPERATIONS  
AND  
REQUEST FOR IMMEDIATE CEASE AND DESIST**

**Mohammed K. Ghods, Esq.  
mghods@lexopusfirm.com**

**Jeremy A. Rhyne, Esq.  
jrhyne@lexopusfirm.com  
LEX OPUS APC**

**3070 Bristol Street, Suite 530  
Anaheim, California, 92706  
Telephone: (949) 825-6140  
Facsimile: (949) 825-6141**

**Dated: August 19, 2016**

**Attorneys for Complainant**

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

In the Matter of the Complaint of:

Starline Tours of Hollywood, Inc., a  
California corporation,

Complainant

vs.

EHM Productions, Inc, a California  
corporation, A.K.A and dba TMZ,  
MBLC Productions, Inc., a California  
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Celebrity Tour

Defendants

Case No. C16-06-007

**FIRST AMENDED COMPLAINT FOR UNLAWFUL OPERATIONS**  
**AND**  
**REQUEST FOR IMMEDIATE CEASE AND DESIST**

COMES NOW, STARLINE TOURS OF HOLLYWOOD, INC.  
("Complainant" or "Starline"), a California Passenger Stage Corporation and  
Transportation Charter Party Carrier of Passengers (PSG0000227) pursuant to  
authorities issued by this Honorable Commission, to allege for its First Amended  
Complaint as follows:

**1. Identity of Complainant.**

The legal name and mailing address of Complainant is:

STARLINE TOURS OF HOLLYWOOD, INC.  
2130 S. Tubeway Avenue  
Commerce, CA 90040  
(323) 201-0114

**2. Attorney for Complainant.**

The legal counsel for Complainant and law firm to whom all correspondence, pleadings and orders regarding this matter should be sent, is:

Mohammed K. Ghods, Esq.  
Jeremy A. Rhyne, Esq.  
LEX OPUS APC  
3070 Bristol Street, Suite 530  
Costa Mesa, CA 92626  
Telephone: (949) 825-6140  
Facsimile: (949) 825-6141  
Email: mghods@lexopusfirm.com  
jrhyne@lexopusfirm.com

**3. Identity of Defendants.**

The legal name and mailing address of Defendants as listed with the California Secretary of State are:

EHM PRODUCTIONS, INC.  
AKA TMZ, TMZ.COM & TMZ CELEBRITY TOUR  
4000 WARNER BLVD.  
BURBANK, CA 91522

Agent for Service of Process  
C T CORPORATION SYSTEM  
818 WEST SEVENTH ST STE 930  
LOS ANGELES CA 90017

MBLC PRODUCTIONS, INC.  
DBA TMZ TOUR & TMZ CELEBRITY TOUR  
4000 WARNER BLVD.  
BURBANK, CA 91522

Agent for Service of Process  
CT CORPORATION SYSTEM  
818 WEST ELEVENTH ST STE 930  
LOS ANGELES, CA 90017



**4. Attorney for Defendants**

Complainant is informed and believes the legal counsel for Defendants and law firm to whom all correspondence, pleadings and orders regarding this matter should be sent, is:

Thomas J. MacBride, Jr., Esq.  
Suzy Hong, Esq.  
505 Sansome Street, Suite 900  
San Francisco, CA 94111  
Telephone: (415) 392-7900  
Facsimile: (415) 398-4321  
Email: tmacbride@goodinmacbride.com

**5. Relief Sought.**

The Complainant seeks an **immediate** order from this Honorable Commission directing the Defendants to cease and desist their unlawful charter-party and passenger stage bus tour and related operations in Los Angeles County. According to the Commission's records, the Defendants have no license or permit issued by the Commission.

Complainant is informed and believes and thereon alleges that Defendant EHM dba TMZ ("TMZ"), is a well-known distributor of gossip news related to the entertainment industry. TMZ runs the website TMZ.com. TMZ also produces a television show. TMZ maintains a highly visible and active presence on social media. Complainant is further informed and believes and thereon alleges that TMZ has claimed to have more than six million followers on Facebook, more than 3.75 million Twitter followers, and more than two million subscribers to its YouTube channel. TMZ is a corporation organized and existing under the laws of the State of California and has its principal place of business in the County of Los Angeles, California.

In or around 2010, TMZ partnered with Starline to create a custom, licensed TMZ-branded bus tour, to be operated by Starline. The TMZ bus tour with Starline was launched in 2011. Video content for the tour was prepared by TMZ. Starline licensed TMZ trademarks from TMZ. The bus tour was operated entirely by Starline who took care of all transportation matters including fare collection. TMZ produced the entertainment on the bus. TMZ was paid by Starline.

TMZ wrongfully terminated its relationship with Starline and expressly represented to Starline that it intended to independently operate a TMZ bus tour on its own and attempted to obtain buses from Starline for its own bus tour. Starline advised TMZ that it needed to have proper authority to operate the bus tour and did not agree to transfer any buses to TMZ.

Complainant is informed and believes and thereon alleges that TMZ began to unlawfully operate its bus tour in or about April/May 2016 without first obtaining permission from this Commission. Complainant is informed and believes and thereon alleges that TMZ's conduct in operating its bus tour has been deceitful as it has resorted to false pretenses by, among other things, using the suspended license of Pearl Limousine Services LLC ("Pearl") for a period of time and using the license of another entity known as the Exclusive Livery Service, Inc. ("ELS") to make it appear that it is not the operator of the TMZ bus tour. Complainant alleges that the bus tour is under the control of TMZ's management and TMZ is not selling tickets for licensed carriers but instead for its own benefit.

Defendant TMZ in its answer to Complainant's original Complaint asserted that the TMZ bus tours is provided through its "affiliate" Defendant MBLC. At the August 8, 2016, Prehearing Conference, Administrative Law Judge Hallie Yacknin presiding, TMZ's General Counsel, Jason Beckerman, represented, among other things, that TMZ does not exist, it [EHM dba TMZ] has stopped any

involvement in the bus tour industry since the termination of its relationship with Starline and that its affiliate, MBLC, is now in the tour bus industry. Complainant alleges that MBLC has Never obtained any authority from this Commission to operate the subject bus tour and regardless of false pretenses, TMZ is the *de facto* operator of the TMZ bus tour and has conspired with others, including MBLC, to violate the law. TMZ has not obtained any authority from this Commission to operate the subject bus tour.

Accordingly, Complainant alleges that Defendants TMZ and MBLC (TMZ and MBLC are hereinafter collectively referred to as “Defendants” or “TMZ”) are not authorized to conduct charter-party carrier bus tour operations without valid and proper authority from the Commission and the use of other licensed carriers’ permits is a deceitful rouse to avoid regulation by this Commission.

As discussed below, Defendants are attempting to mislead the public and knowingly violate the law to subvert this Honorable Commission’s long established rules regulating ground transportation operators thereby causing injury to the public and duly licensed carriers, including Complainant.

##### **5. Legal Basis for Relief.**

Complainant hereby files this Complaint and *Ex Parte* Request for Immediate Cease and Desist Order pursuant to the California Public Utilities Code provisions, including but not limited to the following:

California Public Utilities Code §§1031 and 5371, make it unlawful to operate, or cause to be operated, any passenger stage or charter-party carrier over any public highway in this state and also make it unlawful to engage in transportation services without first having obtained from the commission a certificate that public convenience and necessity require such operation.

California Public Utilities Code § 1702 authorizes any corporation or person to make a complaint against any act or thing, done or omitted to be done, by any public utility, in violation of any provision of law or of any order or rule of the commission and § 1701 grants the right to this commission authority to adopt rules of practice and procedure to govern hearings, investigations, and proceedings.

California Public Utilities Code § 1707 authorizes any public utility complaint on any of the grounds upon which complaints are allowed to be filed by other parties, except that the complaint may be heard *ex parte* by the commission or served upon any parties designated by the commission.

California Public Utilities Code § 5371.6 expressly prohibits unlawful advertisements by unlicensed charter-party carriers of passengers and has declared the same to be unfair competition causing losses to the public and regulated charter-party carriers of passengers. California Public Utilities Code §1034.5 prohibits knowing and willful oral or written advertisement, broadcast, or other holding out to the public, or any portion thereof, that the corporation or person is in operation as a passenger stage.

California Public Utilities Code §§1034, § 5371.6 and 5379.5 authorize the commission, on a complaint alleging that any corporation or person is operating as a passenger stage or charter-party carrier of passengers without a valid certificate or permit, or on its own motion without a complaint, with or without notice of a hearing, order the corporation or person so operating to cease and desist from that operation until the commission makes and files its decision in the matter or until further order of the commission. The commission is empowered with a range of remedies it may implement, including civil and

criminal prosecutions for violation of law as well as disconnection of telecommunication lines used for false advertising and misleading of the public.

**6. Factual Basis for Relief.**

a. Complainant alleges that the Defendants are currently operating an unlawful passenger transportation and bus tour in Los Angeles County as TMZ Tours and/or TMZ Celebrity Tours but have not obtained any authority from this Commission and have falsely & improperly used and continue to use the licenses belonging to other companies such as TCP-21585-A while it was suspended and TCP-22620-A and TCP-22620-P.

b. Complainant alleges that the Defendants are using the false pretenses of being licensed to provide bus tours in Los Angeles through TCP-21585-A, which license belongs to Pearl, and TCP-22620-A and TCP-22620-P, which licenses belong to ELS. True and correct copies of photographs of Defendants' buses identifying the licenses of Pearl and ELS as their operating authority for the TMZ Tour are attached as Exhibit A to the Declaration of Kamrouz Farhadi ("Farhadi Decl") and incorporated herein by reference.

c. Complainant is informed and believes and thereon alleges that even the carriers whose licenses were borrowed by Defendants for the operation of the bus tours failed to have proper licensure at certain periods of time as Pearl's license was suspended and ELS did not have a TCP Class A Certificate. True and correct copies of the relevant pages from the California Public Utilities Commission's website providing details on the TCP licenses of Pearl and ELS are attached as Exhibits B and C to the Farhadi Decl and incorporated herein by reference.

d. Complainant is further informed and believes and thereon alleges that Defendants own and operate the bus tour and control the operations, including but not limited to, routes, pricing, advertisement, sales, fare collection, schedules, and website. A true and correct copy of a printout of Defendants' website is attached as Exhibit D to Farhadi declaration. After this Complaint was filed, a statement was added by Defendants on their TMZ.com website that asserts that the TMZ bus tour is being "operated by Exclusive Livery Service", which is a further falsehood and was added to cover up the illegality of Defendants' conduct in response to Complainant's original Complaint. A true and correct copy of the relevant page from TMZ.com is attached as Exhibit E to the Farhadi Decl and incorporated herein by reference (see also Exhibit H for a copy of a tour ticket expressly stating "Operated by TMZ Celebrity Tour (TMZ Tour).". Defendants control and "operate" the bus tour and have conspired to violate the law and have aided and abetted others in doing so. The marketing materials, including the bus cover graphics, advertise TMZ and direct the public to TMZ's website to book the subject tours.

e. Complainant is informed and believes that Pearl and ELS are limousine operators and at no time advertised or marketed the TMZ bus tour as their own tours and passengers buy tickets for TMZ bus tours on Defendants' website, TMZ.com, and TMZ bus tours are not offered by Pearl and ELS. Indeed, Pearl and ELS make no mention of the TMZ bus tour or any connection with TMZ on their websites. True and correct copies of pages from Pearl and ELS dba Exclusive Sedan Service's website are attached hereto as Exhibits F and G to the Farhadi Decl and incorporated herein by reference. Tickets for the bus tour are sold through TMZ.com. This website is operated by EHM dba TMZ. The ticket expressly states the subject tour was "operated" by TMZ. True and

correct copies of tickets sold on TMZ.com for a May 30, 2016 tour and a June 5, 2016 tour are attached as Exhibit H and I to the Farhadi Decl and incorporated herein by reference. In fact, as early as March 17, 2016, TMZ advertised on its website TMZ.com that the “EXCLUSIVE online ticketing source will be tmztour.com.” A true and correct copy of the relevant page from TMZ.com is attached as Exhibit J to the Farhadi Decl and incorporated herein by reference. Another page from TMZ.com that promotes the subject bus tour states; “This one of a kind experience is produced by the same team behind TMZ.COM and TMZ on TV...” See true and correct copy of the relevant page from TMZ.com attached as Exhibit E, Page 2, to the Farhadi Decl and incorporated herein by reference.

f. Complainant alleges that the Defendants knowingly and willfully, through oral and written advertisement and public broadcast, including but not limited to, the websites TMZ.com, TMZ Celebrity Tour.com, names on the buses, billboards and other means hold out to the public that TMZ is a provider of a bus tour with the primary Google search resulting in the following link and others similar to it as follows:

**TMZ Hollywood Bus Tour - Get Tickets Now! TMZ Tour**

Ad [www.tmz.com/tour](http://www.tmz.com/tour)

(844) 869-8687

Best Celebrity Tour In Hollywood

Reserve your seats now - Book your Special events

The Website states, among other things, the following:

**HARD ROCK CAFE**

**HOLLYWOOD TOUR TIMES**

TOURS DEPART DAILY

For Tour Times Click Here >>

Check in at our TMZ Celebrity Tour Ticket desk  
inside The Hard Rock Café.

6801 Hollywood Blvd. #105, Hollywood, CA 90028

**THE GROVE, L.A. TOUR TIMES**

TOURS DEPART DAILY

For Tour Times Click Here >>

189 The Grove Dr. Los Angeles, CA 90036

Ages 13 and Above \$59 \$54

Ages 2 – 12 \$49 \$44

...

Tours may be cancelled at short notice at TMZ's discretion. If a tour is cancelled, paid guests will have the opportunity to either reschedule for the next available tour, or obtain a refund.

See true and correct copy of the relevant page from TMZ.com is attached as Exhibits D and E to the Farhadi Decl and incorporated herein by reference.<sup>1</sup>

**g.** Complainant is informed, believes and thereon alleges that the Defendants do not have the requisite authority from the Commission to operate as a passenger stage corporation or a charter-party carrier of passengers.

**h.** Complainant alleges that Defendants were warned by Complainant before they commenced bus tour operations that they were not fit and licensed to provide the subject transportation services to the public. Defendants informed Complainant that they would do so over Complainant's objections. By way of background, Complainant and Defendant EHM dba TMZ had prior contractual arrangements by which Complainant Starline operated its

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<sup>1</sup> Defendants have edited the web pages over time, making changes to the TCP numbers used as well as fare information and related items.



vehicles to provide a TMZ branded tour. Defendant EHM dba TMZ produced entertainment content for the passengers on board Starline's vehicles. In the spring of 2016, Defendant EHM dba TMZ informed Complainant that it did not want to continue its relationship with Starline and it intended to "independently launch a TMZ-branded bus tour." Starline objected. Thereafter, in or around April/May, 2016, Defendants conspired to illegally launch their independent bus tour operation trying to duplicate Complainant's ground transportation operation, but without compliance with the law and this Commission's rules. See Farhadi Decl. ¶ 16 and true and correct copy of correspondence from counsel for TMZ attached thereto as Exhibit K and incorporated herein by reference.

i. At the August 8, 2016 Prehearing Conference, Defendants' General Counsel represented that "TMZ does not exist" and was only a brand name. He stated also that Defendant EHM does not do anything related to the TMZ bus tour operations and that the TMZ Tours and TMZ Celebrity Tours are operated by Defendant MBLC, a company that is in the tour bus industry.

j. Complainant is informed and believes that Defendants are confusing and misleading the public and this Commission and are in fact operating an unlicensed bus tour. The tickets for the bus tours are sold exclusively on Defendants' website TMZ.com and advise that the bus tour is "operated by TMZ Celebrity Tour (TMZ Tour)." A true and correct copy of an actual ticket sold by Defendants containing the above admission is attached as Exhibit H to the Farhadi Decl and incorporated herein by reference.

k. Complainant alleges that Defendants do not have the requisite permits and licenses from this Commission, nor do they have the proper maintenance yard, equipment, drivers or any of the other prerequisites for

lawful and safe operation of a PUC regulated ground transportation bus tour company.

As set forth in the Farahdi Decl., the Defendants have used Pearl and ELS' TCP license numbers on the TMZ.com website and the buses for the TMZ bus tours. The Defendants at no time had their own proper license issued by the Commission and instead unlawfully used another's license to pretend they are operating a lawful tour bus operation.

I. Complainant is informed, believes and thereon alleges that Defendants are unlicensed operators with no permission of any kind from the Commission to provide ground transportation and bus tour services and that Defendants have knowingly and willfully resorted to deceptive and fraudulent conduct to operate in violation of the law.

**7. Request for Ex Parte Relief.**

The provisions of the Public Utilities Code including but not limited to §§1034, § 5371.6 and 5379.5 authorize this Honorable Commission to make an order requiring the Defendants to cease and desist from unlawful operations with or without notice. An *ex parte* application is appropriate in as much as the facts necessary to determine the necessity of the order are satisfied by the admissions of the parties and the public records of this Commission. The Commission may receive evidence contained in documents on file as public records with the Commission. Commission records with respect to Defendants' unlicensed status should be undisputed. The use of TCP-21585-A, the suspended license belonging to Pearl and TCP-22620-A and TCP-22620-P belonging to ELS are in the public records of the Commission.

Rule 13.9 of the Commission's Rules of Practice and Procedure permit official notice of facts to be taken by the Commission of such matters as may be judicially noticed by the courts of the State of California. Complainant respectfully requests that the Commission take official notice of the various facts and pleadings so requested in this complaint and its exhibits.

*Ex parte* action is required in order to avoid unnecessary delay in protecting the public from harm by an unlawful operator. There is no harm to the public through such *ex parte* application and there is presumptively no harm to a defendant who is engaged in unlawful conduct to cease such violations of the law. The existence and validity of authority to operate is a fact which is ascertainable with certainty through internal Commission records. The Defendants are not denied any right or process as the Commission's own records evidence their lack of authority to operate. Accordingly, Complainant respectfully requests *ex parte* action for a cease and desist order.

**8. Request for Immediate Relief.**

Complainant respectfully requests that a cease and desist order be issued immediately. The California legislature has declared that it is the policy of this State to discourage and punish the use of false advertising and pretenses, including an express recognition in Public Utilities Code § 5371.6, which expressly states:

(a) The Legislature finds and declares that advertising and use of telephone service is essential for charter-party carriers of passengers to obtain business and to conduct intrastate passenger transportation services. Unlawful advertisements by unlicensed charter-party carriers of passengers has resulted in properly licensed and regulated charter-party carriers of passengers competing with unlicensed charter-party carriers of passengers using unfair business practices. Unlicensed charter-party carriers of passengers have also exposed citizens of the state to unscrupulous persons who portray themselves as properly licensed, qualified, and insured charter-party carriers of passengers. Many of these unlicensed charter-party carriers of passengers have been found to have operated their vehicles without insurance or in an unsafe manner, placing the citizens of the state at risk.

Defendants knowingly and willfully launched a bus operation for profit to carry passengers on its so-called "TMZ Celebrity Tour" and/or "TMZ Tour" without obtaining proper authority from the Commission and has deceitfully resorted to the use of the TCP licenses of other entities to falsely advertize that they are duly permitted operators. The public policy of the State of California and the Commission's own rules mandate immediate action by this Honorable Commission to preserve the integrity of the provisions of the Public Utilities Code and this Commission's procedures and rule making authority. To allow the Defendants to continue operations will call into question the Commission's basic licensure requirements as well as preclusion of end runs around the licensure requirements and will cause irreparable harm to the Commission's ability to effectively govern the public utilities in California, thereby endangering the travelling public.

**9. Request for Evidentiary Hearing and Scheduling Matters.**

The parties attended a Prehearing Conference on August 8, 2016, at which time the need for evidentiary hearing as well as the proposed schedule was discussed between the parties and the presiding ALJ, the Honorable Hallie Yacknin. Starline has requested an evidentiary hearing and issues for such a hearing were identified on the record of the hearing.

With respect to scheduling issues, the same was also discussed at the August 8, 2016, hearing. Starline submits the schedule discussed at the hearing is reasonable, however, Starline respectfully submits that a hearing in November and December will also be acceptable and possibly preferable in this case to ensure the parties have adequate time to deal with all of the issues raised in this proceeding.

For all the foregoing reasons, Complainant respectfully requests that this Honorable Commission:

1. Immediately issue a cease and desist order directing the Defendants to cease and desist operating tour bus services in California for having failed to obtain a proper authority to operate from the Commission;
2. Permanently revoke authorization to operate under TCP-21585-A, TCP-22620-A, TCP-22620-P, or any other entity's authority and permanently bar the Defendants from receiving a permit or certificate based on their illegal, false and misleading conduct;
3. Commence an investigation into this matter as the Commission deems appropriate;
4. For such other and further relief as this Honorable Commission may deem proper in the circumstances.

DATED: August 19, 2016

LEX OPUS APC

By: /s/ Mohammed K. Ghods  
MOHAMMED K. GHODS  
JEREMY A RHYNE  
Attorneys for Complainant  
3070 Bristol Street, Suite 530  
Costa Mesa, CA 92626  
Telephone: (949) 825-6140

VERIFICATION

I have read the foregoing AMENDED COMPLAINT FOR UNLAWFUL OPERATIONS AND REQUEST FOR IMMEDIATE CEASE AND DESIST and know its contents.

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of August 2016 at Los Angeles, California.



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KAMROUZ FARHADI  
Chief Executor Officer of Starline Tours  
of Hollywood, Inc.

### **DECLARATION OF KAMROUZ FARHADI**

I, KAMROUZ FARHADI, declare and affirm that I have personal knowledge of the facts set forth below and, if called upon as a witness, will testify as follows:

1. I am currently the Chief Executive Officer of Starline Tours of Hollywood, Inc. ("Starline"). Starline is a California corporation holding certificates of authority issued by this Honorable Commission to operate as a Passenger Stage Corporation and Charter-Party Carrier of Passengers (PSG0000227).
2. Starline seeks an **immediate** order from this Honorable Commission directing EHM PRODUCTIONS, INC. dba TMZ and MBLC PRODUCTIONS, INC. (collectively "TMZ") to cease and desist its unlawful passenger transportation and bus tour operations in Los Angeles County.
3. I have personally observed that TMZ is using "TCP-21585-A" which I am informed and believes belongs to Pearl Limousine Services LLC ("Pearl"). I have personally observed that TMZ is using "TCP-22620-A," and "TCP-22620-P" on its TMZ tour buses which I am informed and believes belongs to Exclusive Livery Services, Inc. ("ELS"). True and correct copies of photographs of Defendants' buses identifying the licenses of Pearl and ELS as their operating authority for the TMZ Tour are attached as Exhibit A hereto.<sup>1</sup>
4. Attached hereto as Exhibit B is a true and correct copy of the relevant page from the California Public Utilities Commission's website providing details on the TCP license of Pearl.
5. Attached hereto as Exhibit C is a true and correct copy of the relevant page from the California Public Utilities Commission's website providing

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<sup>1</sup> Exhibits have been redacted to block faces appearing in the pictures in the interest of avoiding unnecessary controversy by inclusion of individual's faces in this proceeding.

details on the TCP license of ELS.

6. Attached hereto as Exhibit D is a true and correct copy of a printout from Defendants' website TMZ.com.

7. Attached hereto as Exhibit E are true and correct copies of pages from Defendants' TMZ.com website wherein TMZ represents that the TMZ bus tour is being "Operated by Exclusive Livery Service."

8. Attached hereto as Exhibit F are true and correct copies of pages from Pearl's website.

9. Attached hereto as Exhibit G are true and correct copies of pages from ELS dba Exclusive Sedan Service's website.

10. Attached hereto as Exhibit H is a copy of a tour ticket for a May 30, 2016 TMZ bus tour wherein it states that the TMZ bus tour is "Operated by TMZ Celebrity Tour (TMZ Tour)."

11. Attached hereto as Exhibit I is a copy of a tour ticket for a June 5, 2016 TMZ bus tour.

12. Attached hereto as Exhibit J is a true and correct copy of a page from Defendants' TMZ.com website wherein TMZ represents that the "EXCLUSIVE online ticketing source will be tmztour.com."

13. I have reviewed the Commission's online records and have found no license or permit of any kind issued to TMZ.

14. Since May 6, 2016, I have personally observed TMZ regularly operate an unlawful passenger transportation and bus tour in Los Angeles.

15. I have searched of the Commission's records and have not found the requisite authority from the Commission issued to TMZ to advertise and operate the bus tours as it does.

16. Before it commenced its bus tour operations I personally informed TMZ, through its executive management that it was not fit and licensed to provide



the subject transportation services to the public. TMZ informed my company that it would do so over our objections. By way of background, my company, Starline, and TMZ had prior contractual arrangements by which Starline operated its vehicles to provide a TMZ branded tour. TMZ operates a celebrity gossip TV show and website. TMZ provided the "TMZ type entertainment" for the passengers on board Starline's vehicles for tours provided by Starline. Earlier in 2016, TMZ informed Starline that it did not want to continue its relationship with Starline. TMZ specifically stated it intended to "independently launch a TMZ-branded bus tour." Thereafter, TMZ illegally launched its independent bus tour operation trying to duplicate Starline's bus transportation operation, but without compliance with the law and this Commission's rules, in addition to violation of Starline's other rights. Attached hereto as Exhibit K is a true and correct copy of the letter sent by TMZ reflecting that it intended to launch its own bus tour.

17. To my knowledge, in addition to lack of requisite permits and licenses from this Commission, TMZ does not have a maintenance yard, proper equipment, drivers or any of the other prerequisites for lawful and safe operation of a PUC regulated bus transportation company.

18. Based on my observations and experience, TMZ is operating the tour entirely and contrary to the laws that govern bus transportation as I know them. I request the Commission issue an immediate cease and desist order as requested.

I declare under penalty of perjury under the laws of the State of California  
and the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of August 2016 at Los Angeles, California.

A handwritten signature in black ink, appearing to read 'K. Farhadi', written over a horizontal line.

KAMROUZ FARHADI

# EXHIBIT A

EXHIBIT A

PEARL LIMOUSINE  
TCP-21585-A  
CA-477821







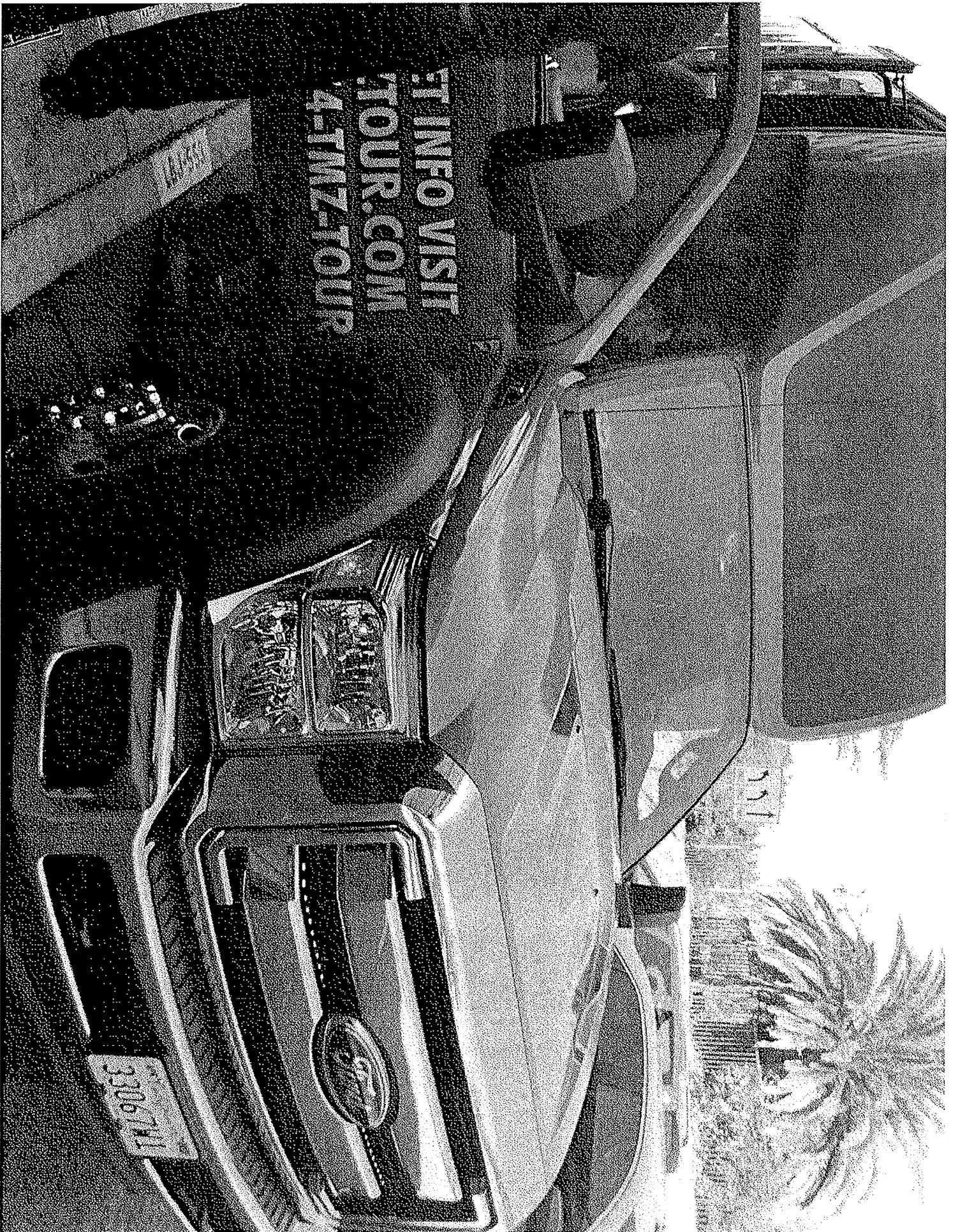
EXCLUSIVE  
LIVERY SERVICE INC.  
TCP 22620-A  
CA203022

EXCLUSIVE  
LIVERY SERVICE INC.

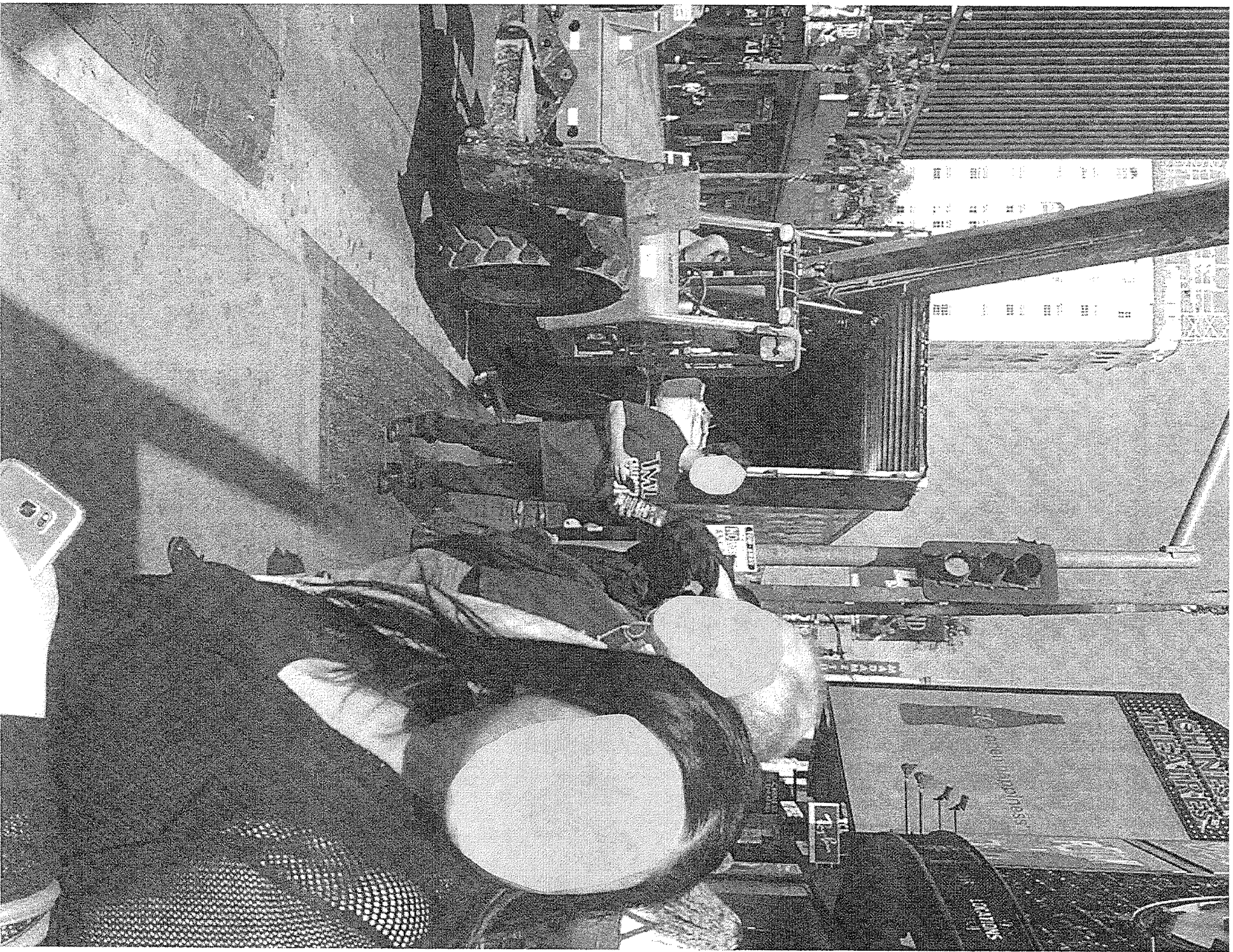
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LIVERY SERVICE INC.

EXCLUSIVE  
LIVERY SERVICE INC.

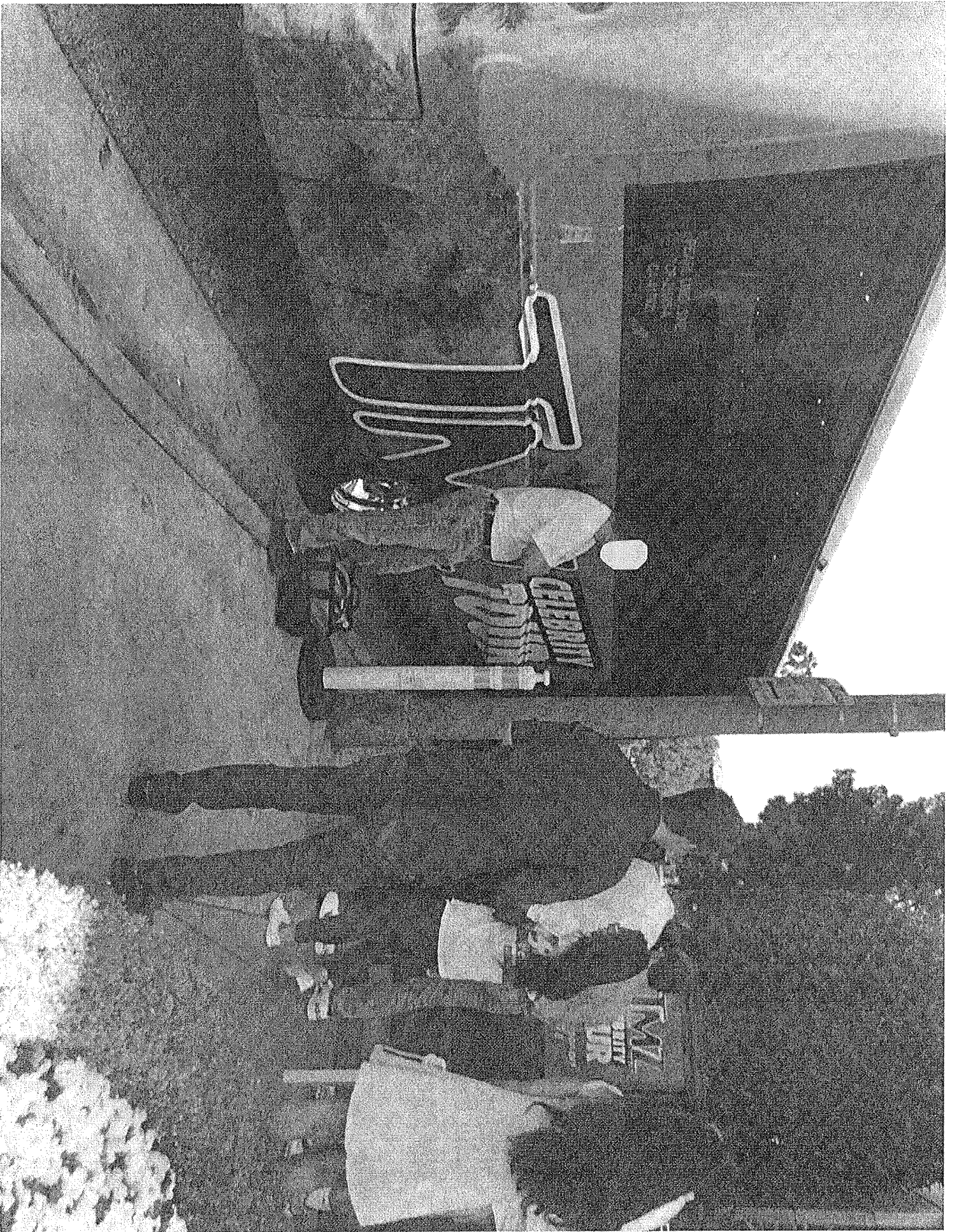




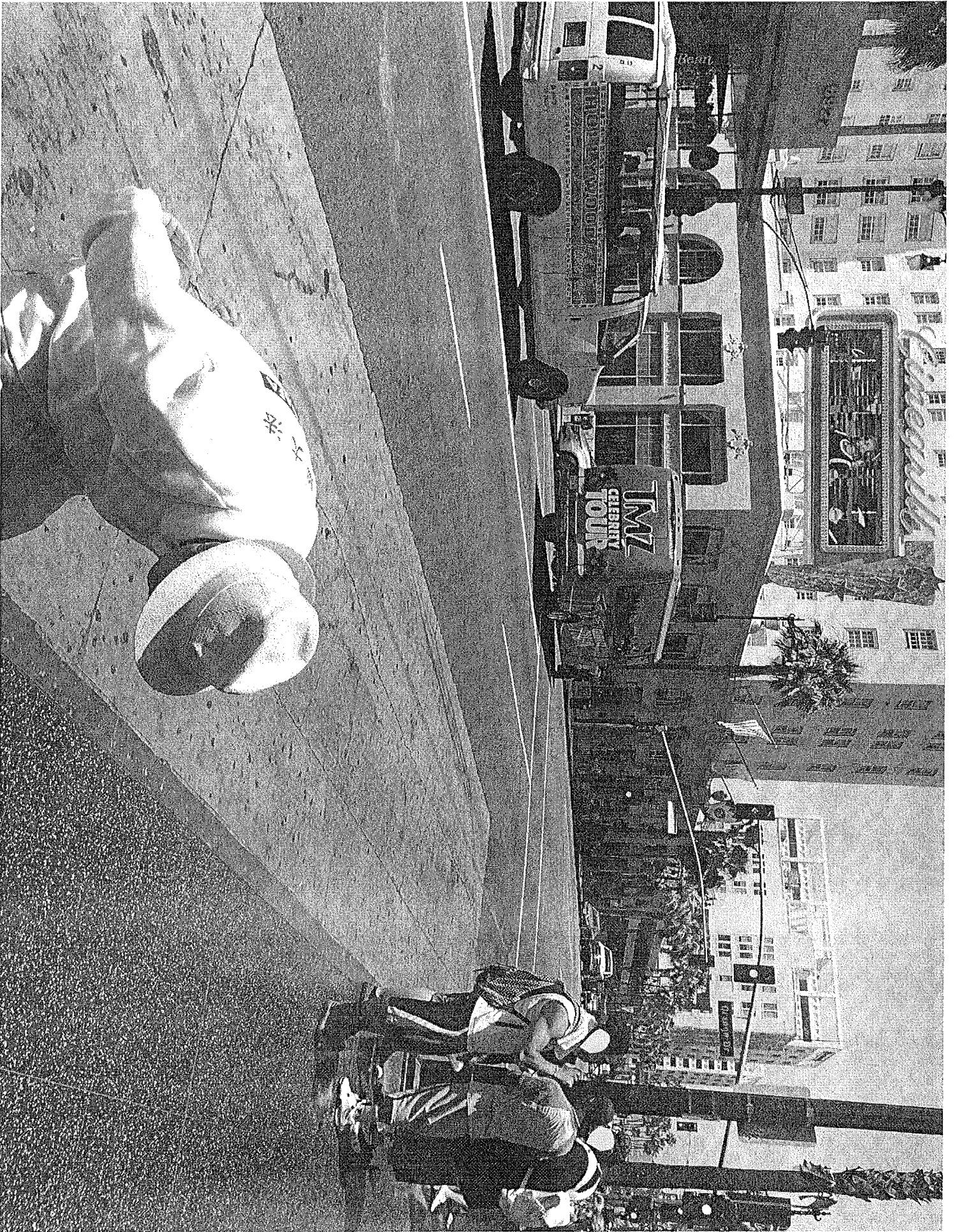












# EXHIBIT B

EXHIBIT B



>>Lookup Home > Results List > Details

**BASIC DETAILS for PSG0021585**[Return](#)

**Carrier ID:** PSG0021585  
**Carrier Status:** Suspended  
**Carrier Name:** PEARL LIMOUSINE SERVICES LLC  
**Carrier DBA:** PEARL LIMOUSINE SERVICES LLC  
**Contact Name:** ANUSHAVAN HARUTYUNYAN CEO  
**Carrier Phone:** (818) 800-0234  
**Mailing Address:** 8561 ORION AVE  
N. HILLS, CA 91343  
**Physical Address:** 8561 ORION AVE  
N. HILLS, CA 91343

**List of Authorities for PSG0021585**

Authorities
Transportation Charter Class B Certificate - Suspended - 06/01/2016
Transportation Charter Class A Certificate - Suspended - 06/01/2016

1 - 2

**List of Insurance Policies for PSG0021585**

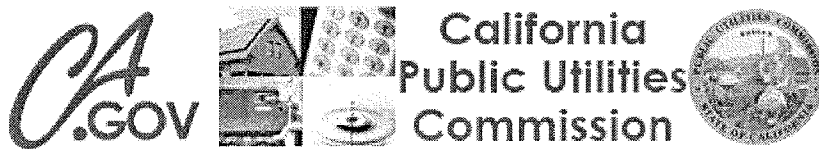
Insurance Policy	Policy#	Address
Excess Policy	XS192847	LANCER INSURANCE COMPANY 370 WEST PARK AVENUE LONG BEACH, NY 11561-
PL and PD Policy	BA170664	LANCER INSURANCE COMPANY 370 WEST PARK AVENUE LONG BEACH, NY 11561-

1 - 2

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>>Lookup Home > Results List > Details

# EXHIBIT C



>>Lookup Home > > Details

#### BASIC DETAILS for PSG0022620

[Return](#)

**Carrier ID:** PSG0022620  
**Carrier Status:** Active  
**Carrier Name:** EXCLUSIVE LIVERY SERVICE INC  
**Carrier DBA:** EXCLUSIVE SEDAN SERVICE  
**Contact Name:** RONALD W STEIN (CEO)  
**Carrier Phone:** (818) 765-7311  
**Mailing Address:** 12580 SATICOY ST BLDG C  
 NORTH HOLLYWOOD, CA 91605  
**Physical Address:** 12580 SATICOY ST BLDG C  
 NORTH HOLLYWOOD, CA 91605

#### List of Authorities for PSG0022620

Authorities
Transportation Charter Party Class P Permit - Active
Transportation Charter Class B Certificate - Active
Transportation Charter Class A Certificate - Pending - 04/28/2016

1 - 3

#### List of Insurance Policies for PSG0022620

Insurance Policy	Policy#	Address
PL and PD Policy	PHPK1166983	PHILADELPHIA INDEMNITY INSURANCE COMPANY ONE BALA PLAZA SUITE 100 BALA CYNWYD, PA 19004-
PL and PD Policy	PHPK1330353	PHILADELPHIA INDEMNITY INSURANCE COMPANY ONE BALA PLAZA SUITE 100 BALA CYNWYD, PA 19004-
PL and PD Policy	PHPK1490809	PHILADELPHIA INDEMNITY INSURANCE COMPANY ONE BALA PLAZA SUITE 100 BALA CYNWYD, PA 19004-
Workers Compensation Coverage	EXWC703789	BERKSHIRE HATHAWAY HOMESTATE INSURANCE CO 3333 FARNAM STREET SUITE 300 OMAHA, NE 68131
Workers Compensation Coverage	XJUB4058T27513	TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA ONE TOWER SQUARE HARTFORD, CT 06183-
Workers Compensation Coverage	TWC3315276	TECHNOLOGY INSURANCE COMPANY 59 MAIDEN LANE NEW YORK, NY 10038

1 - 6

[Top](#)

[>>Lookup Home](#) > > [Details](#)

---

# EXHIBIT D

EXHIBIT D



TMZ.COM

TMZ CELEBRITY TOUR

TMZ STORE

**BOOK TICKETS NOW! ▶**

BOOKINGS POWERED BY ZERVE

# TMZ CELEBRITY TOUR

**1-844-TMZ-TOUR**BOOK YOUR OWN BUS!  
**TMZ**  
CUSTOM  
CHARTERS  
MORE INFO ▶**CELEBS FROM THE TOUR!****1-844-TMZ-TOUR****BOOK TICKETS NOW! ▶**

BOOKINGS POWERED BY ZERVE

0:02 / 1:56

TMZ Tour

4 videos



Rihanna, Justin Bieb...

Rihanna, Justin Bieber, Celine Dion, The Rock, Ben Affleck...



Jeff Goldblum and D...

Our TMZ Celebrity Tour Bus in Hollywood got Dr. Phil and Jeff...

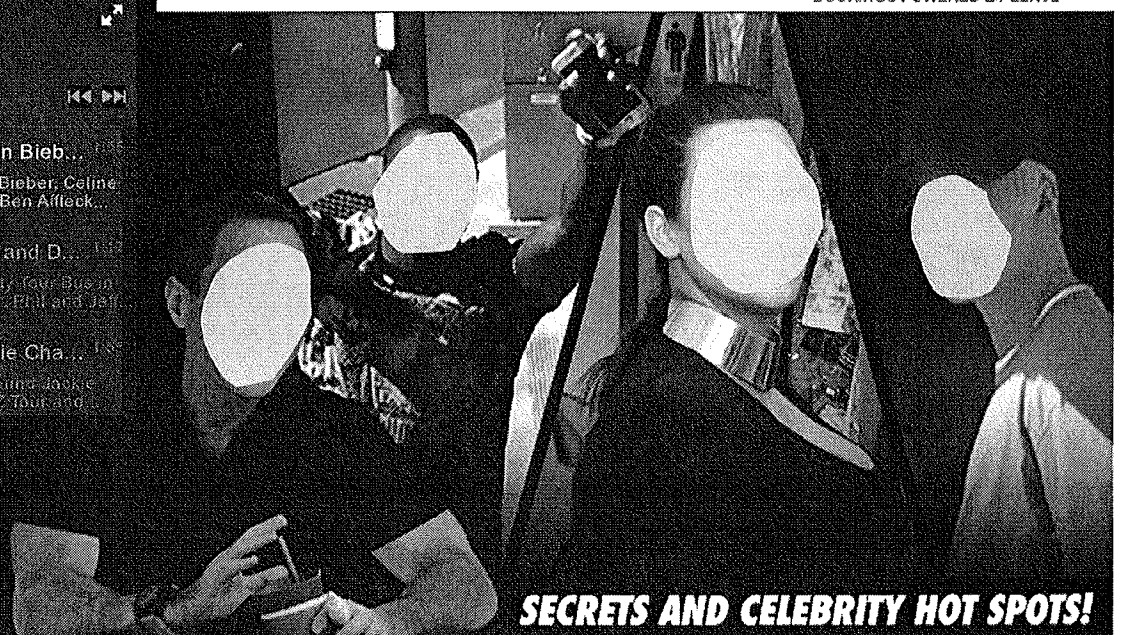


TMZ and Jackie Cha...

Our tour guide, Jackie Chan, on the TMZ Tour and...

Certificate of Excellence  
2013

TMZ Celebrity Tour

**SECRETS AND CELEBRITY HOT SPOTS!**

## TMZ SHOWS YOU THE REAL HOLLYWOOD!

- ★ See the hottest spots in Hollywood, Beverly Hills and the Sunset Strip where celebrities go to play.
- ★ Hear inside information and never revealed details about Hollywood celebs, and the stories that TMZ made famous.
- ★ Tour guides direct from TMZ on TV, on the look-out and ready to film celebrities.

**FOR MORE INFO CALL 1-844-TMZ-TOUR**

### HARD ROCK CAFE HOLLYWOOD TOUR TIMES

MONDAY - THURSDAY  
9:30am, 12:00pm, and 5:30pmFRIDAY - SUNDAY  
9:30am, 12:00pm, 5:30pm, and 8:00pmCheck in at our TMZ Celebrity Tour Ticket desk  
inside The Hard Rock Cafe.

6801 Hollywood Blvd #105, Hollywood, CA 90028

### THE GROVE, L.A. TOUR TIMES

DAILY



Book your best trip, every trip

### TMZ Celebrity Tour

TripAdvisor Traveler Rating



Based on 516 traveler reviews

[Read reviews](#)

© 2016 TripAdvisor LLC



2:45pm

Check in at our TMZ Celebrity Tour Ticket Cart in front of Pottery Barn at The Grove.

189 The Grove Dr. Los Angeles, CA 90036

**AGES 13 AND ABOVE**

~~\$50~~ **\$54**

**AGES 2 - 12**

~~\$40~~ **\$44**

**"WE SAW RIHANNA!" — TRIP ADVISOR**  
**"MUST DO: TMZ'S HOLLYWOOD BUS TOUR" — LA MAGAZINE**  
**"ABSOLUTELY HILARIOUS" — YELP**

## NOTHING ELSE LIKE IT...

The secrets of Hollywood... The places celebs go to party and play... The hotspots where you can mingle with the stars... Immerse yourself in the ultimate Hollywood experience — **THE TMZ CELEBRITY TOUR.**

This one of a kind experience is produced by the same team behind **TMZ.COM** and **TMZ on TV** — so you'll get hilarious videos, the secrets that we've never revealed on the TV show or the website, and even chances to win free stuff!

And we're doing it all on our custom-designed bus with a state-of-the-art audio/video system and TMZ Guides ready to stop the bus, interview celebrities and send the footage directly back to the TMZ Newsroom.

**Experience Hollywood — TMZ Style**

**BOOK TICKETS NOW! ▶**

BOOKINGS POWERED BY ZERVE



**FOR MORE INFO CALL 1-844-TMZ-TOUR**

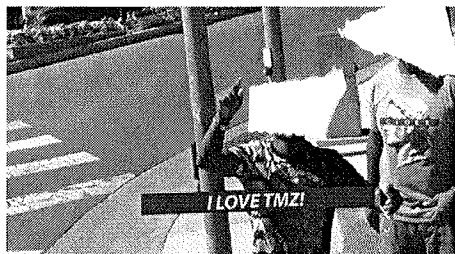
*Tours may be cancelled at short notice at TMZ's discretion. If a tour is cancelled, paid guests will have the opportunity to either reschedule for the next available tour, or obtain a refund.*

TCP-21585-A



# EXHIBIT E

Like 29K

**BOOK TICKETS NOW! ▶**

0:09 / 1:56

TMZ Tour  
7 videos



Rihanna, Justin Bie... 1:55

Rihanna, Justin Bieber, Celine  
Dion, The Rock, Ben Affleck...



Howie Mandel and ... 1:23

The TMZ Celebrity Tour Bus  
spotted out Michael Rapport...



Is That Tia Or Tame... 1:11

Our tour guide spotted one of  
the Mowry twins out and she...



*See the hottest spots in Hollywood, Beverly Hills and the Sunset Strip where celebrities go to play.*

*Hear inside information and never revealed details about Hollywood celebs, and the stories that TMZ made famous.*

*Tour guides direct from TMZ on TV, on the look-out and ready to film celebrities.*

**FOR MORE INFO CALL 1-844-TMZ-TOUR**

## **HARD ROCK CAFE HOLLYWOOD TOUR TIMES**

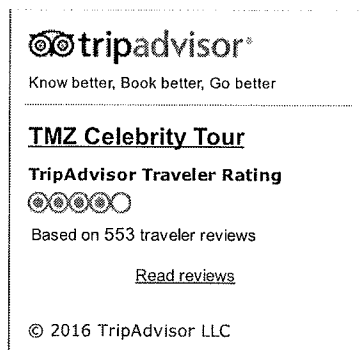
**TOURS DEPART DAILY**  
**For Tour Times Click Here »**

Check in at our TMZ Celebrity Tour Ticket desk inside The Hard Rock Cafe.

6801 Hollywood Blvd #105, Hollywood, CA 90028

## **THE GROVE, L.A. TOUR TIMES**

**TOURS DEPART DAILY**  
**For Tour Times Click Here »**



Check in at our TMZ Celebrity Tour Ticket Cart in front of the Nike Store at The Grove.

189 The Grove Dr. Los Angeles, CA 90036

**AGES 13 AND ABOVE**

**~~\$59~~ \$54**

**AGES 2 - 12**

**~~\$49~~ \$44**

## NOTHING ELSE LIKE IT...

The secrets of Hollywood... The places celebs go to party and play... The hotspots where you can mingle with the stars... Immerse yourself in the ultimate Hollywood experience — **THE TMZ CELEBRITY TOUR.**

This one of a kind experience is produced by the same team behind **TMZ.COM** and **TMZ on TV** — so you'll get hilarious videos, the secrets that we've never revealed on the TV show or the website, and even chances to win free stuff!

And we're doing it all on our custom-designed bus with a state-of-the-art audio/video system and TMZ Guides ready to stop the bus, interview celebrities and send the footage directly back to the TMZ Newsroom.

**Experience Hollywood — TMZ Style**

**FOR MORE INFO CALL 1-844-TMZ-TOUR**

*Tours may be cancelled at short notice at TMZ's discretion. If a tour is cancelled, paid guests will have the opportunity to either reschedule for the next available tour, or obtain a refund.*

**OPERATED BY EXCLUSIVE LIVERY SERVICE**

TCP-22620-A

# EXHIBIT F



Pearl Limousine  
SERVICES



Home

Our  
Services

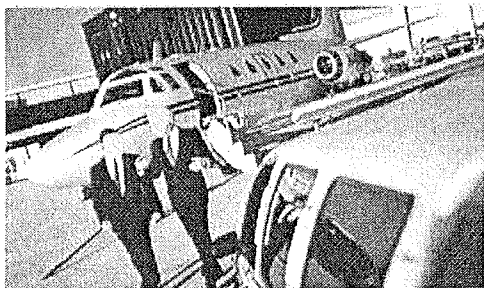
R

**877-500-5366**

24 Hour Reservation Line



## *Corporate*



Our reliable chauffeurs will be there in style for your special day to escort you, your family and friends to the ceremony, the reception or anywhere else you need to go.

## *Special Events*



We've got everything you need for your special event, including knowledgeable chauffeurs who know your city inside and out.



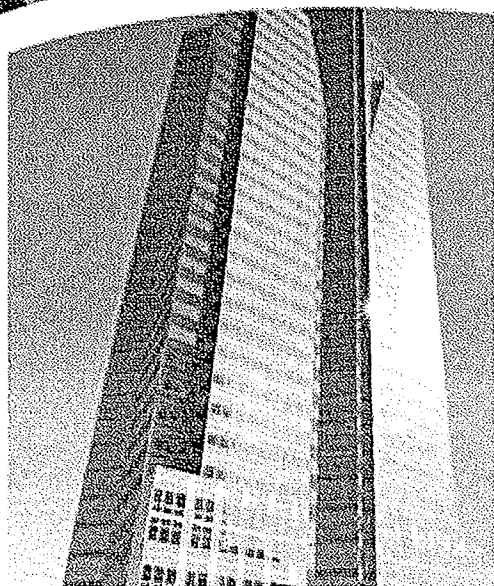
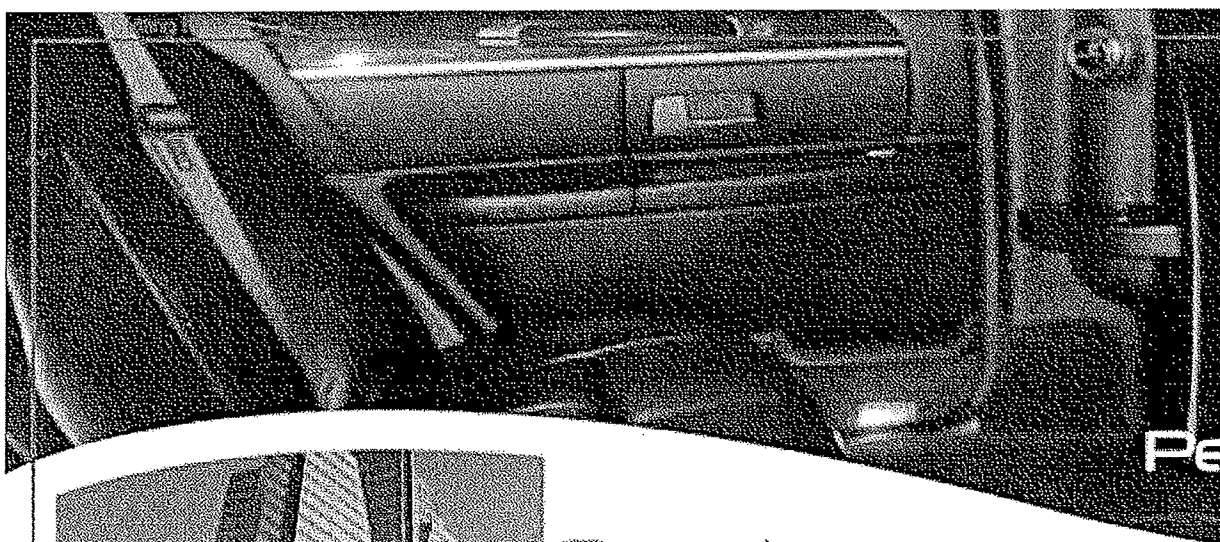
[Home](#)

[Our  
Services](#)

[R](#)

**877-500-5366**

24 Hour Reservation Line



## Service

Pearl Limousine Service offers business services. For over twenty years, Pearl Limousine Service has been a nationwide leader in providing business travel services.

Pearl Limousine Services offers 24 hour service 365 days a year. We are committed to service excellence. Our team of dedicated ground travel professionals is ready to assist you with just one call.

## Luxury Fleet

Mercedes S-Class / Lincoln MKT / Lincoln Towncar / Chevy Suburban  
7 Passenger Cadillac Escalade / Mercedes Sprinter LWB

Our fleet is maintained by our own state-of-the-art maintenance team. Each vehicle is tuned and inspected before it is sent into a trip. Each vehicle is equipped with the latest amenities to make your trip enjoyable.



# EXHIBIT G

[Home \(home\) >](#)[Chauffeur Login \(https://mobile.liverycoach.com/exclusive/chauffeurportal/LogIn.aspx\)](https://mobile.liverycoach.com/exclusive/chauffeurportal/LogIn.aspx)[Vendor Login \(https://exclusivesedan.liverycoach.com/extensions/FarmTripsLogIn.aspx\)](https://exclusivesedan.liverycoach.com/extensions/FarmTripsLogIn.aspx)[in \(http://www.linkedin.com/company/exclusive-sedan?trk=top\\_nav\\_home\)](http://www.linkedin.com/company/exclusive-sedan?trk=top_nav_home)[\(http://pinterest.com/exclusivesedan/\)](http://pinterest.com/exclusivesedan/)[f \(https://www.facebook.com/pages/Exclusive-Sedan-Service/179274145152?ref=ts\)](https://www.facebook.com/pages/Exclusive-Sedan-Service/179274145152?ref=ts)[t \(http://twitter.com/exclusivesedan\)](http://twitter.com/exclusivesedan)

**CALL 818 765 7311 (TEL:8187657311)**  
**OR TEXT US AT 818 765 7311 (SMS:+18187657311)**

Please feel free to give us a call or Send us an email (<mailto:info@exclusivesedan.com>).

**MAKE A RESERVATION**

(<https://exclusivesedan.liverycoach.com/>)

**SIGN-UP FOR OUR NEWSLETTER**

## WELCOME TO THE WORLDWIDE EXPERTISE OF EXCLUSIVE SEDAN SERVICE

Exclusive Sedan Service is committed to providing quality chauffeured ground transportation for executives, business travelers and special event & meeting professionals in Los Angeles and around the world.

Whether you need transportation to and from the airport, or something slightly more elaborate, Exclusive Sedan is your best choice for all your limousine, private sedan, and other professional chauffeured services.

Experienced Exclusive Sedan professionals – whether on the telephone processing your reservation, expertly driving you in one of our exquisite vehicles, or coordinating transportation for your red carpet event, Exclusive Sedan manages the complexities of corporate, meeting & event, and special event transportation with ease. Whether contacting us by telephone, email, booking online or using our

mobile app, our well-trained personnel handle every detail efficiently and expertly. Frequently called upon to manage the very special needs of red carpet event attendees, we have earned the reputation of providing "the best to the best".

Our operating philosophy is simple: Hire the best team of highly skilled, professionally trained, knowledgeable, discreet and courteous office staff and chauffeurs and provide them with cutting edge technology both in the office and in the finest vehicles available in the industry today, and we will exceed every client expectation. We know that we are only as good as our last ride, so our clients always arrive at their destinations safely and in style. Whether you are dining out with the "stars" who call the Los Angeles area home, or "starring" in your own special event, meeting, or incentive program, you can trust Exclusive Sedan Service to provide you with limousine service (limousine-service-los-angeles) at an unparalleled level of expertise and professionalism. Everyone at Exclusive Sedan Service prides themselves on being one of the best in the business not only providing Los Angeles limousine (limousine-service-los-angeles) and sedan services (sedan-service-la), but delivering the same level of "exclusive" service around the world.

With partnerships in more than 550 cities, serving thousands of airports, Exclusive manages our clients' limousine & ground transportation requirements no matter where in the world they find themselves. One call does, indeed, do it all; from reservations and local service arrangements, to consolidated billing, Exclusive Sedan is a world class global provider.

## WHAT WE OFFER



(corporate-vehicles)

### CORPORATE VEHICLES (CORPORATE-VEHICLES)

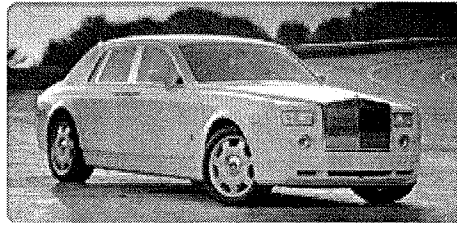
Choose from a nice selection of limousines and sedans available for all your business needs.



(motion-picture-vehicles)

### MOTION PICTURE (MOTION-PICTURE-VEHICLES)

We have many vehicles from all eras that are used exclusively for the motion picture industry.



(specialty-vehicles)

## SPECIALTY VEHICLES (SPECIALTY-VEHICLES)

Trust Exclusive Sedan Service for all of your wedding or other elegant social engagement transportation needs.



(air-transportation)

## AIR TRANSPORTATION (AIR-TRANSPORTATION)

Exclusive Sedan Services offers many different air charter options for personal and professional purposes.

Watch our new video, "Digital Hitchhiking: Think Before You App!" and make sure that you are properly armed with the necessary tools to Ride Responsibly™ and make smart choices when it comes to your safety.

See more ([https://www.youtube.com/watch?v=s9H3\\_zF6HVM](https://www.youtube.com/watch?v=s9H3_zF6HVM))



(<http://www.rideresponsibly.org/>)



Make your reservations with Exclusive Sedan Service online and save time. Start here with our Online Reservation Form (<https://exclusivesedan.liverycoach.com/>) or Request a Jet Charter Quote (<http://www.celebrityjet.com/affiliate-charter-request-form?VIPID=1724>).

Or make your reservations by phone 818-765-7311 (tel:8187657311) / 800-400-SEDAN (7332) (tel:8004007332). Open 24 hours.

Copyright © Exclusive Sedan Service, 12580 Saticoy St, North Hollywood, CA (California) 91605, United States. All Rights

Reserved. Developed by Drive Profit (<https://www.driveprofit.com/>).

Driver Schedule (<https://www.driverschedule.com/ExclusiveSedan>)

# EXHIBIT H

EXHIBIT H

## **TMZ Celebrity Tour - Departing from Hard Rock Cafe**

Operated by TMZ Celebrity Tour (TMZTour)

This is your e-ticket. You will need to present this to the seller in order to participate in the activity.

Date: Monday, May 30, 2016

Start Time:

# of Tickets: 2 - Tour Tix (Ages 13 and above)

Attendee Name:

Duration: 2 Hours

Ticket Code:

Total Charges: \$108.00

Scan Check In  
Code:

# zerve

**Thank you for purchasing  
tickets with Zerve!**

People who have taken this activity have also enjoyed the following activities.

Learn more, read buyer reviews & buy tickets at the indicated Web pages. To order via phone, call Zerve at (800) 979-3370 or (212) 209-3370.

**From this same seller:**

**TMZ Celebrity Tour - Departing from The Grove**

See the hottest spots in Hollywood, Beverly Hills and the Sunset Strip, where your favorite celebrities go to eat, shop and party.

[www.zerve.com/TMZTour/2](http://www.zerve.com/TMZTour/2)

**Important Notice:** Please note check in begins 30 minutes before your scheduled tour time. If you do not check in within 10 minutes of your scheduled tour time your seats will be forfeited. Feel free to bring a camera and your celebrity spotting skills.

**Meeting Location:** The bus picks up at the Hard Rock Cafe in Hollywood. The address is 6801 Hollywood Blvd, Hollywood, CA (90028). The nearest parking is available at the Hollywood & Highland Center Parking Garage. You'll check in at the TMZ Tour Desk inside the Hard Rock Cafe. If in doubt or you get lost please call (213) 291-2464. We are always here to help.

**For questions regarding this activity, contact TMZTour:**

Seller Email: [TourTickets@TMZ.com](mailto:TourTickets@TMZ.com)

Seller Phone: (213) 291-2464

### **Activity Policies:**

- **Non-refundable, can be rescheduled with 24 hours notice:** Once purchased, tickets cannot be refunded. You may reschedule your tickets (subject to availability) only if you do so at least 24 hours in advance.

### **IMPORTANT - Please read:**

- **Your ticket code will be required to attend the activity:** This is your proof of purchase, and you cannot attend the activity without it.
- **Please arrive early:** Activities generally start right on time. You will not be entitled to a refund or rescheduling if you are late and miss the activity.
- **Your tickets were purchased through Zerve, Inc:** 'Zerve, Inc' is what will appear on your credit card statement for this charge. All purchases are subject to Zerve's [Terms of Use](#) and fall under Zerve's [Privacy Policy](#). If you have any questions regarding these terms or your purchase, contact Zerve immediately at [service@zerve.com](mailto:service@zerve.com) or (800) 979-3370 or (212) 209-3370.
- **Your tickets are guaranteed:** You do not need to contact the seller to confirm your tickets. They will be expecting you at the start time.
- **Please review this activity after attending:** It's quick and easy and helps future buyers learn from your experience!
- **Enjoy your activity!**

# EXHIBIT I

EXHIBIT I



Zerve Logo

**Thank you for purchasing tickets through Zerve!**

## YOUR ORDER INFORMATION

### **TMZ Celebrity Tour - Departing from Hard Rock Cafe**

TMZ Celebrity Tour

Provided by TMZ Celebrity Tour (TMZTour)

TourTickets@TMZ.com

(213) 291-2464

Ticket Code:

Sun, Jun 5, 2016 at 5:30pm [PDT] (2 Hours)

### **2 TOTAL TICKETS**

2 Tour Tix (Ages 13 and above)

**SCAN AT CHECK-IN**

ABOUT THIS EVENT

**IMPORTANT:** Please note check in begins 30 minutes before your scheduled tour time. If you do not check in within 10 minutes of your scheduled tour time your seats will be forfeited. Feel free to bring a camera and your celebrity spotting skills.

**WHERE TO MEET:** The bus picks up at the Hard Rock Cafe in Hollywood. The address is 6801 Hollywood Blvd, Hollywood, CA (90028). The nearest parking is available at the Hollywood & Highland Center Parking Garage. You'll check in at the TMZ Tour Desk inside the Hard Rock Cafe. If in doubt or you get lost please call (213) 291-2464. We are always here to help.

Map to meeting location

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**THE TOTAL CHARGE TO YOUR CREDIT CARD FOR THIS ORDER IS:**

Ticket Charges:	\$108.00
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<b>Total Charges:</b>	<b>\$108.00</b>
-----------------------	-----------------

Charged To: Visa (ending in

Order Number:

Approval Number

Purchased On:

**IMPORTANT NOTES**

**CREDIT CARD CHARGE:**

The charge for this purchase will be listed as "Zerve" on your credit card statement. (Zerve is a Corporation that processes ticket sales for the sellers of these activities.)

**THIS EMAIL:**

Please retain this email; you may need it later if you lose your printed e-ticket.

---

**PLEASE NOTE THE FOLLOWING IMPORTANT MATTERS:**

**ZERVE DOES NOT OPERATE ANY OF THESE ACTIVITIES:**

Zerve, Inc., is solely the ticket-seller for the above activities. Zerve has no role in the actual operation of these activities, so please contact the seller(s) directly if you have any activity-specific questions or concerns. For more information on this purchase, see our [Terms of Use](#).

Zerve, Inc. · 333 Hudson St. · New York, NY 10013 · USA

# EXHIBIT J



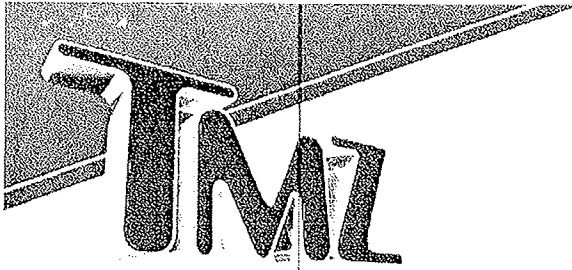
**There's a brand new way... and it's  
the only way... to book the TMZ  
Celebrity Tour online — and you're  
looking at it!**

**For tours and charters beginning  
April 12, 2016, your EXCLUSIVE  
online ticketing source will be  
[tmztour.com](http://tmztour.com).**

**Come back soon for ticketing  
information and tour times.**

# EXHIBIT K

EXHIBIT K



Email: jason.beckerman@telepictv.com  
Direct Dial: 818.972.0977

February 18, 2016

Via U.S. Mail and Email

Mohammed K. Ghods, Esq.  
Ghods Law Firm  
2100 N. Broadway, Suite 210  
Santa Ana, CA 92706  
mghods@lexopusfirm.com

Re: **Confidential Settlement Proposal**  
Subject to FRE § 408 and Cal. Evid. Code § 1152

Dear Mohammed:

Thank you and your clients for coming to our offices yesterday.

During yesterday's meeting, TMZ confirmed its intention to independently launch a TMZ-branded bus tour, while putting forward a proposal that, we believe, presents the best opportunity for our clients to put their past disputes behind them and forge a new and mutually beneficial business relationship.

The elements of TMZ's proposal are as follows:

1. The parties shall extend the 60-day wind down period set forth in Section 8.2 of the TMZ-Starline Tour Bus Agreement ("Agreement"), to 180 days ("Wind Down Period").
2. TMZ shall forestall enforcement of TMZ's judgment against Starline (if any) stemming from the Brockman Litigation ("Litigation Judgment") until the conclusion of the Wind Down Period (the "Termination Date").
3. During the Wind Down Period, the parties shall (1) perform their respective contractual obligations under the Agreement (including Starline's timely payments of all monthly revenues due TMZ); and (2) work in good faith toward establishing a mutually-beneficial relationship to commence on or after the Termination Date (including, in particular, the cross-promotion of each other's tours).
4. On the Termination Date, Starline shall transfer to TMZ clear title to and possession of the three TMZ tour buses currently in use by the Tour. TMZ shall thereupon reduce Starline's Litigation Debt (if any) by an amount equal to the buses' fair market

value (as determine by a mutually acceptable third party), exclusive of the value of TMZ's A/V equipment.

5. TMZ shall withdraw its outstanding demand for an audit of Starline's books and records.

Given the short amount of time mandated by the contract to wind down our existing relationship, I must request your response to this proposal by Tuesday, February 23, 2016. Please include additional details on your proposal for Starline to maintain a back-end operational role on the new TMZ Tour.

I am, of course, available to speak by phone at your convenience before that date.

This letter is not a complete statement of all of TMZ's rights and remedies, or its legal or factual positions, all of which are hereby reserved.

Sincerely,

Jason Beckerman